

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

DANIEL UMPA, on behalf of himself and all
others similarly situated,

Plaintiffs,

v.

THE NATIONAL ASSOCIATION OF
REALTORS, HOMESERVICES OF
AMERICA, INC., BHH AFFILIATES, LLC,
HSF AFFILIATES, LLC, THE LONG &
FOSTER COMPANIES, INC., KELLER
WILLIAMS REALTY, INC., COMPASS,
INC., EXP WORLD HOLDINGS, INC., EXP
REALTY, LLC, REDFIN CORPORATION,
WEICHERT REALTORS, UNITED REAL
ESTATE, HANNA HOLDINGS, INC,
DOUGLAS ELLIMAN, INC., DOUGLAS
ELLIMAN REALTY, LLC, AT WORLD
PROPERTIES, LLC, THE REAL
BROKERAGE, INC., REAL BROKER, LLC,
REALTY ONE GROUP, INC., HOMESMART
INTERNATIONAL, LLC.,

Defendants.

Case No. 4:23-cv-00945-SRB

Hon. Stephen R. Bough

ORAL ARGUMENT REQUESTED

**WEICHERT REAL ESTATE AFFILIATES, INC., d/b/a WEICHERT, REALTORS'
MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

Pursuant to Federal Rule of Civil Procedure 12(b)(2), and in accordance with the Court's order on the Joint Motion for a Coordinated Scheduling Order (ECF No. 83), Defendant Weichert, Realtors, by and through its attorneys of record, hereby moves to be dismissed from this action for lack of personal jurisdiction. This Court lacks personal jurisdiction over Weichert, Realtors under either the Missouri long arm statute, Mo. Rev. Stat. § 506.500, the Federal Due Process Clause, or Section 12 of the Clayton Act, 15 U.S.C. § 22.

This Motion is based on Weichert's concurrently-filed Suggestions in Support of its Motion to Dismiss, the Declaration of William A. Scavone and the accompanying Exhibit 1 thereto, and any additional submissions and arguments presented at or before a hearing or ruling on this Motion.

Dated: February 26, 2024

Respectfully submitted,

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REALTORS*

CERTIFICATE OF SERVICE

I hereby certify that on February 26, 2024, a copy of the foregoing document was electronically filed through the ECF system and will be sent electronically to all persons identified on the Notice of Electronic Filing.

/s/ Dylan I. Ballard
DYLAN I. BALLARD